

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
(PITTSBURGH)

IN RE:

CHRISTOPHER KIM,

Debtor

\*\*\*\*\*

THE HUNTINGTON NATIONAL BANK,

Movant,

v.

CHRISTOPHER KIM, and RONDA J.  
WINNECOUR, CHAPTER 13 TRUSTEE

Respondent(s).

CASE NO.: 19-24642-CMB

CHAPTER 13

JUDGE CARLOTA M. BOHM

Hearing Date/Time: March 25, 2020 @10:00 AM

**NOTICE OF HEARING AND RESPONSE DEADLINE  
REGARDING MOTION OF THE HUNTINGTON NATIONAL BANK FOR  
ADEQUATE PROTECTION PAYMENTS OF ITS CASH COLLATERAL RENTS  
FROM 8313 Perry Highway, Pittsburgh, PA; Parcel No. 611-C-261**

TO THE RESPONDENT(S):

You are hereby notified that the Movant seeks an order affecting your rights or property.

You are further instructed to file with the Clerk and serve upon the undersigned attorney for Movant a response to the Motion by no later than **March 16, 2020** (i.e., seventeen (17) days after the date of service below), in accordance with the Federal Rules of Bankruptcy Procedure, the Local Rules of this Court, and the general procedures of the presiding judge as found on the Court's webpage at [www.pawb.uscourts.gov](http://www.pawb.uscourts.gov). If you fail to timely file and serve a written response, an order granting the relief requested in the Motion may be entered and the hearing may not be held. Please refer to the calendar posted on the Court's webpage to verify if a default order was signed or if the hearing will go forward as scheduled.

You should take this Notice and the Motion to a lawyer at once.

A hearing will be held on **March 25, 2020, at 10:00 a.m.** before Judge Carlota M. Bohm in Courtroom B, 54th Floor U.S. Steel Tower, 600 Grant Street, Pittsburgh, PA 15219. Only a limited time of ten (10) minutes is being provided on the calendar. No witnesses will be heard. If there is an issue of fact, an evidentiary hearing will be scheduled by the Court for a later date.

Date of Service: **February 27, 2020**

/s/ Wade T. Doerr

Wade T. Doerr, PA.I.D. # 200753

23 S. Main Street, Third Floor,

Akron, Ohio 44308

(330) 434-1000

Attorney for Movant, The Huntington National  
Bank

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing ***Notice of Hearing and Response Deadline of The Huntington National Bank's Motion for Adequate Protection Payments of its Cash Collateral Rents*** was served by ECF Transmission, this 27 day of February 2020 upon the following:

Russell A. Burdelski, representing Debtor, [atyrusb@choiceonemail.com](mailto:atyrusb@choiceonemail.com)

Office of the US Trustee, [ustpregion03.pi.ecf@usdoj.gov](mailto:ustpregion03.pi.ecf@usdoj.gov)

Ronda J. Winnecour, Chapter 13 Trustee, [cmevf@chapter13trusteewdpa.com](mailto:cmevf@chapter13trusteewdpa.com)

and by regular U.S. mail, postage prepaid, to:

Russell A. Burdelski

The Law Offices of Russell A. Burdelski

1020 Perry Highway

Pittsburgh, PA 15237-2109

Ronda J. Winnecour

Suite 3250, USX Tower

600 Grant Street

Pittsburgh, PA 15219

/s/ Wade T. Doerr

Wade T. Doerr (200753)

*Counsel for The Huntington National Bank*